

Code of Conduct



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REV. 12/15/2025

Code of Conduct and Ethics is the responsibility of the Legal Division. It cannot be changed without the approval of the Chief Ethics and Compliance Officer.

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A Note from CEO Ben Minicucci

This is an exciting time to be part of Alaska Airlines, Hawaiian Airlines and Horizon Air. We have a lot of positive momentum with a strong strategic plan, a fantastic long-term vision, and a clear purpose to connect our guests to the world with a remarkable travel experience rooted in safety, care and performance.

Safety is our organization's foundational value and highest priority. As we continue to grow and add new global destinations and bring on new employees, the most important thing we can do is maintain our culture of safety and care, grounded in our shared values. These values reflect who we are and how we show up for ourselves, each other, our guests and our business:

- Own safety.
- Do the right thing.
- Be caring and kind.
- Deliver performance.

To help guide our work, we also follow our Code of Conduct and Ethics (Code). Each employee at Alaska, Hawaiian and Horizon, as well as each member of our Boards of Directors, is required to follow our Code. Take a few minutes to read it and take it to heart. If you have any questions, please ask.

We want every person to feel empowered to speak up when something isn't right. If you see something that's falling short of our values or our Code, be sure to tell someone – this could be a leader, the Ethics and Compliance Hotline, your HR team, or me. When you do that in good faith, you can expect your leadership – including me – to stand behind you. I take this commitment to our employees seriously, and retaliation of any kind will not be tolerated.

To achieve our vision, it requires all of us supporting each other and working together to bring our values and culture to life with every flight, every day. I'm excited about where we're going, and I'm so grateful to be on this journey with you.

Sincerely,

Ben Minicucci

CEO & President, Alaska Air Group

Welcome to Our Code of Conduct and Ethics

Who's Covered by Our Code

If you are an employee, officer or independent director at Alaska Air Group (AAG), Alaska Airlines, Hawaiian Airlines or Horizon Air (which may be referred to as the "Company" or "Companies" throughout the Code), then you are expected to follow this Code.

Each year, officers, directors and most employees are required to acknowledge their responsibility to comply with our Code. Failure to follow our Code could result in discipline, termination of employment, or not being re-nominated to serve on our boards of directors.

We expect everyone who is covered by our Code to read, understand, and apply it by:

- Doing your job in an honest, safe, professional, and courteous manner — while abiding by all applicable laws, regulations, and policies.
- Treating guests, suppliers, and fellow employees with dignity and respect.
- Avoiding situations where your interests conflict with the interests of the Companies.
- Timely completion of required training about the Code and other compliance-related topics.

The Code is available on Team AAG under Manuals/Policies and in the footer on the home page. Team AAG is accessible to all our employees. The Code is also available externally on our Investor Relations site on alaskaair.com. The electronic document on the intranet supersedes any other version previously printed or otherwise retained.

What About Our Suppliers

We also have a [Supplier Code of Conduct](#) that describes our expectations of Suppliers. Suppliers, their employees, subcontractors, and agents must comply with the Supplier Code of Conduct to do business with any of our Companies. For more information or to discuss questions about the Supplier Code of Conduct, talk with Supply Chain Management (SCM.inquiry@alaskaair.com).

When Does Our Code Apply

If you are covered by this Code, it applies any time you are performing your job or are otherwise representing our Companies. This includes when you are out of town on business or on layovers.

Using Our Code

How to Ask a Question or Report a Violation

While our Code strives for clarity on common ethics and compliance issues, it does not address every situation. You may face situations where you feel unsure about what is right under our values or policies. When that happens, talk to your manager, supervisor, or Human Resources Business Partner about what you should do.

Anonymity - If you would like to submit a question or report anonymously, you can call our Ethics and Compliance Hotline number or submit the report online without sharing your identity. You can find the number and website here in this Code, on Team AAG, and for many employees on the back of your employee badge. All reports or questions from the hotline are reviewed by the Ethics and Compliance department for prompt review and response.

Collective Bargaining Agreement - If your concern involves your collective bargaining agreement, follow the procedures available under that agreement.

Contacts

The Hotline is available 24/7:

- By phone in the U.S./Canada: 1-888-738-1915
- **Online:** www.aag.ethicspoint.com
- **By phone from countries outside of U.S./Canada:** visit [here](#) for more information.

The People Team:

- **People Resource Line:** 1-844-899-3617 (Company employees only)
Monday – Friday (except holidays) 8 a.m. – 5 p.m. PST
- **Email:** peopleresourceline@alaskaair.com

What Happens After You Report Something Through the Hotline

For most concerns reported through the hotline, the Ethics and Compliance department partners with Alaska Employee Relations, Horizon HR or other responsible divisions to review the concerns. If an investigation is launched, it will include a review of all available relevant information and discussions with knowledgeable individuals. Investigations might involve representatives from legal, human resources, labor relations, customer advocacy, union leadership, our operations teams, and others. Once an investigation has concluded, we act in accordance with our values and policies. To respect the confidentiality of all parties involved, the action taken is not always shared with the person who raised the concern.

Non-Punitive Reporting

We recognize that everyone makes mistakes. Our policy is to encourage people to report Code issues involving their own conduct so we can offer guidance and help resolve issues that may be inconsistent with our Code. To help you, we offer the following self-reporting program:

- Aviation Safety Action Program (ASAP)

Remember, you must meet the standards of the ASAP program to qualify. Although self-reporting is not a way of avoiding the consequence of conduct or performance issues that do not meet the criteria of a non-punitive reporting program, you will not be disciplined for self-reporting provided you were not engaged in unacceptable behaviors. These are defined as illegal activities, drug and/or alcohol abuse, workplace violence, reckless and/or intentional conduct, intentional falsification of records, and intentional disregard for safety, regulations, policies, or procedures.

You can learn more about the ASAP program by visiting the [SMS Manual](#) (Section 8.5.4 – Aviation Safety Action Program). The [Virtual Safety Center](#) is a hub for information about Company safety and specifically, the [Safety Policy](#).

Cooperating With Internal Investigations

When you are involved in an internal investigation into possible violations of regulations, laws, or policies, you should provide all requested documents and information, and must be forthcoming and truthful in response to questions from authorized personnel or individuals. You must not destroy or alter any relevant documents. If you are covered by a collective bargaining agreement, you may receive support from union leadership in the internal investigation.

For more information about records retention, refer to the: [Records & Information Management Policy](#).

Our Commitment to No Retaliation

We pride ourselves on being a safe place to work. Anyone who reports a violation of our Code truthfully and in good faith (meaning you have honest intentions) is protected against retaliation from any leader or co-worker. If you believe you have been the target of retaliation, contact the Ethics and Compliance department, HR, or a leader you trust.

For more information about our commitment to anti-retaliation, refer to your Company's policy manual: [Alaska - Our People Policies](#), [Hawaiian Employee Policies](#), and [Horizon- Employee Policies](#).

A Culture of Safety and Compliance

Managing airlines is complex. Our industry is highly regulated – federal, state, and local agencies, as well as other countries where we do business have, or claim to have jurisdiction over virtually every aspect of our operation. Because of that, we expect you to be aware of key laws and regulations that cover your work.

Staying Safe

Our number one priority is maintaining the safety of our guests and employees. In fact, we often hold ourselves to a higher standard than the law requires. We follow all the applicable laws that govern health and safety, give you safety equipment when needed, and insist you work in a safe manner. Every employee should pause work if safety problems are encountered and report or resolve those problems, reaching out to their manager or supervisor as needed.

Nothing in this Code prohibits employees from exercising their legal right to contact any governmental agency on a confidential basis when they have reasonable concerns regarding the legal or safety implications of any action taken by employees or any other person acting on behalf of the Companies. We also encourage employees to bring such concerns to the attention of any member of management (including any member of the Safety Division) in keeping with our open-door policy. Such concerns will be treated confidentially whenever possible, and no retaliation or harassment of employees voicing such concerns will be tolerated.

For more information on safety, refer to the: [Safety Manual](#).

Our Key Regulators

Our Companies regularly interact with U.S. regulatory agencies such as the Department of Transportation (DOT), the Federal Aviation Administration (FAA), the Department of Homeland Security (DHS), and the Securities and Exchange Commission (SEC).

DHS, for instance, oversees the security of passengers, employees, and aircraft. The DOT monitors how we handle delayed, cancelled, or overbooked flights; how we accommodate passengers with disabilities; and how we advertise our schedules and fares and the Federal Aviation Administration Regulations cover much of how we fly our aircraft and conduct ground operations.

SEC rules may require us to identify and report, or eliminate, certain conflicts of interest between an employee, officer, or independent director and one of our Companies.

These agencies and others have an impact on almost everyone working at one of our Companies. Employees should understand the rules that govern them, so we remain safe and stay consistent with our Code and other policies.

Drugs and Alcohol

To ensure public safety, we are held to a higher standard when it comes to having drugs or alcohol in our system while at work. Additionally, employees who perform certain safety-sensitive duties are subject to DOT-FAA drug and alcohol regulations and the Companies' policies, which are in many cases more stringent than DOT-FAA regulations.

There may be occasions where we serve alcohol at a Company event. If you choose to drink at these events, use good judgment. If you are planning an event where alcohol will be served, make sure you get the necessary approval.

These guidelines also apply during:

- Business trips
- Layovers
- Functions hosted by one of our suppliers
- Other professional or community meetings

For more information, refer to the following manuals: [Alaska- Drug and Alcohol Policy](#), [Alaska - Our People Policies- Alcohol at Company Event](#), [Horizon-Drug and Alcohol Policy](#), and [Horizon- Employee Policies- Alcohol at Company Event](#).

Employees can also reference the [Drug Abatement subsite](#) for helpful links, FAQ's and Leader responsibilities.

Request for Information

If you receive a routine request for information from a regulatory agency, you should inform your manager and coordinate with your division's compliance representative to cooperate with the requesting agency. You should not respond yourself without that coordination or authorization from your division's compliance representative.

Do not accept service of any legal documents. If you receive a subpoena, letter, e-mail, phone call, personal visit, or other request for information from a government or law enforcement agency or an outside lawyer, contact the [Legal division](#) immediately for guidance.

For more information on working with regulatory agents, refer to the following policy: [Requests for Information, Warrants, and Subpoenas](#).

Competing Fairly

Our Companies compete aggressively yet fairly with other airlines. We follow federal and state antitrust laws that prohibit monopolistic conduct, restraining competition, and other anticompetitive activities. To that end, we must be especially cautious when speaking with our competitors about certain topics. A4A, RAA, IATA, **oneworld** forums and other industry groups are great for working together on issues of common interest to the airline industry, but never to coordinate or agree — even informally or indirectly — on competitive topics such as routes, frequencies, capacity levels, fares, fees, or other charges. If you work in Alliances, Network Planning, Pricing, Cargo, Revenue Management, Airport Affairs & Development, or another department that has frequent dealings with other airlines, Legal is available to answer questions and to provide periodic training on antitrust awareness.

For more information, refer to the: [Antitrust Policy](#).

Avoiding Corruption and Bribery

It is unlawful for anyone representing one of our Companies to offer anything of value to a foreign official to influence them, induce them to violate their duties, or otherwise gain an improper business advantage. The laws in this area are strict: even minor favors like complimentary upgrades, lounge passes, and fee waivers may be viewed as an illegal bribe. We are responsible for the conduct of vendors acting on our behalf, so watch for red flags such as overly familiar relationships with foreign officials, a reputation for corruption, unusual or suspicious financial arrangements, or refusal to be audited. Anti-corruption laws also require us to keep meticulous records about any payments we or our vendors make to foreign officials. It's not always easy to tell if a guest, vendor, or potential business partner is a foreign official, so if you're contemplating a new business arrangement outside the U.S., start by working with Legal or Supply Chain Management to assess the situation.

For more information, refer to the: [Anti-Corruption Policy](#).

Representing the Facts and Numbers Accurately

As a publicly traded company, it is critical that we provide complete, accurate, and timely information concerning the Companies. We communicate this information in a variety of ways, including by filing reports with the SEC, giving press releases, airing webcasts, and attending and announcing at industry and financial conferences. Even if you do not directly prepare these reports and communications, you may be involved in the process of recording or gathering the underlying information. If you are involved, we ask that you follow the accounting rules and the Companies' policies that apply to your work.

Avoiding Insider Trading

You may own Alaska Air Group stock through an employee stock purchase plan, as part of your compensation package, or through individual investment activities. When trading Alaska Air Group stock, you should take precautions to make sure your decisions are not based on "inside information." Inside information is defined as fact(s) about one or any of our Companies that is not public knowledge. The same limitation applies to trading in other companies' stock if you have non-public inside information about that company.

You should not trade, or encourage others to trade, Alaska Air Group stock based on insider information. Insider trading may result in disciplinary action, including termination, and/or civil or criminal sanctions. Alaska Air Group's Regulation Fair Disclosure (FD) Policy, as required by the SEC, limits what we can say to brokers, analysts, bankers, and other financial professionals without simultaneously disclosing it to the public.

Depending on your job, you may also have stock trading windows and blackout periods. You should make sure you are aware of and follow these guidelines.

For more information, refer to the following policies:

- [Insider Trading Policy](#)
- [Our Financial Control Policies](#)
- News Media Policies for:
 - [Alaska- Our People Policies](#)
 - [Hawaiian – Ka 'Ike Pono](#)
 - [Horizon- Employee Policies](#)
- [Regulation FD Summary and Statement of Policy](#)

Avoiding Conflict of Interest – Receiving and Giving Gifts, Taking a Second Job

A conflict of interest occurs when your personal interests or activities, or those of your immediate family members, interfere (or could appear to interfere) with your ability to make sound and objective decisions in the best interest of the Companies.

We ask that you do not participate in activities that may create, or appear to create, a conflict of interest with any of our Companies. Even with the best of intentions, the appearance of a conflict of interest can damage our reputation.

We're committed to award business solely based on legitimate business considerations, including quality, service, and competitive price. This means that you and your immediate family members should avoid investments or other financial activities that could interfere, or appear to interfere, with your ability to remain objective and loyal to our Companies. Likewise, you shouldn't show favoritism when choosing suppliers, vendors, and partners.

To help you better understand this policy and avoid conflicts of interest, here are a few

guidelines to follow:

- Our Companies will not do business (other than the provision of airline services) with a supplier, guest, or vendor when it is owned (greater than 1%) by an employee, officer, independent director or their immediate family members, without the prior written approval of the Chief Compliance Officer.
- Employees, officers and independent directors may not own 1% or more interest in a competitor without the prior written clearance of the Chief Compliance Officer.
- Employees, officers and independent directors may not make a loan to, or receive a loan from, a person or company, that our Companies do, or seek to do business with, other than large banks or other lending institutions.

Receiving Gifts

Another situation where your interests may become or appear conflicted is when you accept gifts or other business courtesies that relate to your position with our Companies. Accepting these can be interpreted as an attempt to influence your business decisions. Examples include discounts, passes, use of equipment/facilities, personal favors, meals, drinks, or entertainment, such as tickets to cultural or sporting events.

You should make business decisions solely on legitimate business interests and take precautions when situations include the offer of gifts or business courtesies.

In some situations, the exchange of gifts or courtesies may be acceptable. For example, opportunities to enhance the business relationship through social, cultural, or sporting events as the guest of a vendor or supplier may be acceptable if it doesn't influence business decisions. Privileges that are generally available to persons involved in the travel industry, such as travel industry discount rates at hotels and car rentals, are also exempt from this policy.

Because many situations may not be clear, here are some additional guidelines and criteria to follow:

- Never accept cash or cash equivalents (like prepaid credit cards) in the normal course of business. It may be appropriate to accept **gift cards**, so long as they are \$25 or less and follow the other guidelines above.
- Let your division vice president and the Chief Compliance Officer know of all offers of gifts or business courtesies from organizations where you are the relationship manager, purchasing decision maker, or purchaser.
- If you're not the relationship manager, purchasing decision maker, or purchaser, you may only accept a gift or business courtesy if it is within the range of usual and customary gifts and business courtesies that are exchanged in similar circumstances in the industry.
- If in the range of usual and customary gifts and the value exceeds **\$250**, you should put it in **writing for your supervisor**, either in an email or written letter. If a gift is more than **\$500**,

you need to get approval, in advance, from your division vice president or above.

- In the same respect as receiving gifts or business courtesies, you should not solicit gifts or business courtesies from anyone conducting or seeking to do business with our Companies.
- Some divisions may set more restrictive policies for their employees, so be sure to review the policies for your division.

Giving Gifts

Offering or giving gifts and business courtesies follow similar guidelines as receiving them. If you offer or give a gift or business courtesy on behalf of our Companies, make sure it supports legitimate business interests. You should not give a gift or business courtesy, no matter how modest, if it could be viewed as an attempt to improperly promote the Companies' business. You should also ask about and be sensitive to the gift policy of the company with which you are doing business.

There are strict rules that apply when doing business with U.S. or foreign government officials. You cannot give any gifts to Members of Congress, their staff, or federal Executive Branch officials. This includes giving gifts of even nominal value (*e.g.*, promotional items, upgrades, waiving fees, *etc.*). Similar limits exist for gifts to most state and local officials. When there are exceptions, you should get prior approval from the Government Affairs department before offering any gift.

There are also rules governed by the U.S. Department of Labor that prohibit certain union officials from receiving certain monetary payments, certain travel-related privileges (for non-employees), and certain other "things of value" that could create or appear to create a situation where a union official's decision could be influenced.

For more information, refer to the following policies: [Congressional & Executive Branch Gift Policy](#).

Taking a Second Job

We understand that some employees may choose to take on a second job. If you take on

outside work, make sure that it doesn't interfere with your work with us such as showing up late, calling in sick, or leaving early to do outside work.

In general, you cannot take a second job if it can affect or appear to affect your ability to make decisions in the best interest of our Companies. You cannot take a job that would create an actual or perceived conflict with the Companies' interests. This generally includes paid consulting work for knowledge or information you gained while working at one of our Companies.

If you are interested in taking a second job, you must fill out the [Outside Employment Request Form](#) (Alaska), [Ultipro Outside Employment Request](#) (Hawaiian) or [Outside Employment Form](#) (Horizon) before accepting the position. This form will be reviewed by your leader, HR and in some cases your vice president or the Chief Compliance Officer. In most cases, if your position is non-supervisory and the position you seek is non-supervisory and will not interfere with your role with the Company, it will be approved. Employees at an Air Group Company may not seek a second job at another Air Group Company, including Alaska, Horizon, Hawaiian or McGee.

If you have questions about second jobs, talk to your supervisor, manager, or HR.

For more information on outside employment including examples of what constitutes outside employment, refer to: [Alaska – Our People Policies](#), [Hawaiian – Ka 'Ike Pono](#) and [Horizon- Employee Policies](#).

Participating in Civic or Political Activities

It's a privilege to participate in public affairs and political activities such as holding an office in local government, voicing your opinion at a city council meeting, or attending a fundraising event for a political party or candidate. We encourage you to get involved, but on your own time. Your public or political activities should not interfere with your job performance or create an actual or potential conflict of interest for one or more of our Companies.

Elected officers of one of our Companies may authorize public or political contributions on behalf of the respective company, if approved by the Chief Compliance Officer.

Our Work Environment

Our Companies are committed to cultivating a safe and strong place to work, live and fly. Our employees are expected to foster a workplace culture that is free of unlawful harassment, intimidation, violence, bias, and discrimination. We stand against hate, intolerance and racism of any kind and for this reason, our Companies have zero-tolerance for harassment and discrimination in the workplace. This means employees who are found to have engaged in inappropriate harassing or discriminatory behavior will be held accountable for their conduct in a meaningful, appropriate, and proportionate manner.

Culture and Belonging

Our Companies are committed to a workforce that includes people and voices with a variety of different lived experiences. People from all walks of life fly with us, so it only makes sense that our workforce reflects our guests. We encourage all our employees to bring their authentic selves to work.

We comply with all applicable federal, state and local laws governing nondiscrimination in employment to ensure equal opportunity in all terms, conditions, and benefits of employment or potential employment. We also prohibit discrimination and harassment against any employee or applicant for employment because of race, color, religion, sex, national origin, age, disability, veteran status, genetic information and other legally protected categories.

Unlawful Harassment and Discrimination

We also strive to create a great work environment where our employees feel respected and valued — unlawful harassment and discrimination is prohibited. We don't tolerate behavior that creates an unlawful hostile work environment, which means we don't make derogatory jokes or slurs about our co-workers, use unwelcome gestures, or pass around offensive or rude emails, texts, or printed materials based on their status in a protected class.

Remember, it's not only our Code and the Companies' policies that prohibit unlawful harassment or discrimination — federal, state, and local laws do as well. If you're a people leader, a big part of your job is to ensure there is no unlawful harassment or discrimination occurring among the people who report to you. If you see or hear anything that might be unlawful harassment and discrimination, or even just inappropriate workplace behavior, you must report the behavior immediately to your leader or HR.

Sexual Harassment

Sexual harassment and assault have absolutely no place in our workplace or on-board our flights. Sexual harassment is unwelcome conduct that's sexual in nature. It can be conduct that is threatening, demeaning, or offensive. It can be verbal, physical, or visual conduct. It creates an intimidating, hostile, or offensive work environment, interfering with an employee's and the team's work performance.

Bullying and Violence

Being kind-hearted is at the core of how we treat guests and each other. We don't tolerate bullying behavior. If a co-worker bullies you or other employees, either at work, online, or via social media, we ask that you try to help stop that behavior by talking with the co-worker. If that doesn't work, report it to a leader you trust or to HR.

Sometimes bullying or other workplace confrontations may turn violent. If that happens, employees need to take steps to immediately stop the violent behavior. That may mean calling your local law enforcement officials, a manager or a supervisor, as well as contacting Alaska Airlines' security at security@alaskaair.com. If the situation seems out of control, you should first call local law enforcement before calling Alaska Airlines' security or anyone else.

Be sure to notify Human Resources of any protective orders in effect, or if a potentially violent non-work-related risk exists that could result in violence in the workplace.

For more information on all of these policies, refer to: [Alaska – Our People Policies](#), [Hawaiian – Ka 'Ike Pono](#) and [Horizon – Employee Policies](#).

Social Media

Almost everyone uses social media in one way or another, and we respect your right to maintain an online presence on social media. You should make it clear that your online profiles are personal and that you do not represent our Companies in social media. And even when using your personal profiles, you should not use social media to harass or bully co-workers, guests, or anyone else related to our Companies.

Please respect others and the Companies' confidential information when using social media. You should not post information that isn't public knowledge; for example, confidential information includes new flight routes discussed during internal meetings. However, you may share publicly available information such as changes to our loyalty program announced through public press releases.

Conduct that is not prohibited: This policy is not intended to preclude or dissuade employees from engaging in legally protected activities, such as discussing or disclosing wages, benefits, or terms and conditions of employment or working conditions of employees; forming, joining or supporting labor unions; bargaining collectively through representatives of their choosing; raising complaints about working conditions; or from engaging in legally required or permitted activities.

If you see something on social media that involves one of our Companies and you feel it needs a response, don't handle it yourself. Instead, contact our social media experts by sending a link to socialcare@alaskaair.com or Corporate Communications at newsroom@alaskaair.com or 206-304-0008.

Protecting Our Resources

We're proud to have you as part of the Alaska Air Group family of Companies and we want you to be proud to be here. Part of that pride entails doing your job in a way that treats the Companies' assets with respect and ensures that the Companies' priorities are first.

Handling Company Property With Care

Our Companies own a wide range of assets that can be categorized into physical and intellectual properties.

Physical property includes: computer hardware and software, databases, electronic devices, networks, equipment, real estate, and of course, aircraft. **Intellectual property includes:** trademarks, copyrights, patents and the information and "know how" specific to our business.

We ask that you take care of our property and work to prevent damage, misuse, unauthorized access, or theft. These assets are essential to maintaining our competitive advantage. We also ask that for the most part, you use company equipment for company business, not for personal use. Limited use of items like a copy machine or email are okay, as long as the use doesn't distract from your job or end up being a material cost to the Companies. You can't use the Companies' supplies or resources for any outside employment not involving your work with one of our Companies.

Also, be aware that you are not entitled to your privacy when using any of the Companies' resources, even for personal use.

Any intellectual property you create for our Companies during work time as part of your job, through use of the Companies' resources, or information you learned through your employment, belongs to the Companies, including ideas, inventions, improvements, computer code, proprietary technology, manuals, trade and service marks, artwork, advertising copy, or any works of authorship.

You may not license, assign, or use intellectual property developed during your employment with us for your own gain or to compete with our Companies. You must also treat intellectual property with the same care as other confidential information. Likewise, all intellectual property created by contractors, vendors, or outside consultants engaged by one of the Companies belongs to the applicable Company.

Before starting work with outside consultants, vendors, or contractors, you should make sure agreements are in place that clearly state ownership of the resulting intellectual property.

Our trademarks are vital assets and important components of our brand and identity. All employees, as well as our business partners, should help protect them. To use our trademark, you need to get written permission and clearance from Legal and/or Marketing.

Handling Others' Proprietary Rights With Care

Additionally, we respect the proprietary rights of others. You may not use, copy, distribute, or modify trademarks, copyrighted materials, or any other third party's intellectual property unless you have the prior written consent of the owner. For example, you can't make copies of an article published in a trade publication and distribute it at a meeting.

Keeping Confidential Information Confidential

When you work for one of our Companies, you may learn and come across information that has yet to be made public. You could see documents or overhear conversations about guest information, employee performance, financial and operational numbers, marketing plans, and more. Depending upon your role, you may also access or use personal information related to our guests or employees. Personal information is highly regulated, and any misuse or unauthorized access may result in significant impact to our business. It's important to handle it securely and keep all this information confidential.

Protecting this information is critical to retaining our competitive edge and maintaining our reputation. Our employees are responsible for ensuring this information stays within our Companies. You should refrain from talking about the Companies' business where you might be overheard. Don't put things such as important documents or electronic devices in a place where someone can take or see them. The same goes for information that our Companies obtained under non-disclosure or other agreements. You should never disclose confidential information, including information personal to our employees, to anyone, internally or outside of the Companies, unless you are authorized to do so.

In rare circumstances where you need to use email to send confidential information to a third party, be sure to use the encryption "AAG Secure" in the email title.

Protecting Your Personal and Private Information

Our Companies can access the information you create, send, or store in the Companies' computers, physical files, or other resources. It isn't private. Although it is not routine practice, the Companies can monitor, store, access, and review all email, electronic and physical files, and other information you create or receive using our equipment or on our premises.

We understand that sometimes you may use the Companies' equipment for personal use such as sending a personal email or two. When you do, remember that the information is not private and can be viewed by the Companies, if warranted. Additionally, there may be times when we will disclose such information to law enforcement agencies or to other third parties at our discretion.

For more information, refer to the Intellectual Property policies: [Alaska – Our People Policies](#), [Hawaiian – Ka 'Ike Pono](#), [Horizon- Employee Policies](#) and [ITS Cybersecurity Policies](#).

Records and Information Management (RIM)

As an employee you undoubtedly create, send, receive and/or retain documents as part of your normal job responsibilities. The Companies are committed to effective records and information management (RIM) which includes meeting any legal, regulatory, contractual obligations and audit requirements for record retention and privacy protection.

The RIM policy helps employees identify what a “record” is, who is responsible for maintaining that record, how long the record must be maintained, and when the document may be destroyed.

For more information, refer to the following policy [Records & Information Management Policy.](#)

Protecting Our Communities

Protecting the Environment

We believe that environmental responsibility fits naturally with our values and our guests' expectations. The future depends on how we care for the health of the planet and the communities where we fly and live. We strive to integrate sustainable environmental practices into our everyday business and have set specific and measurable goals to reduce our climate impact. We ask that you stay familiar with both the environmental policies and requirements specific to your job and work location and the goals set out by our Companies.

For more information, refer to the: [AAG Environmental Manual](#) and [Sustainability subsite](#).

Respecting Human Rights

We are committed to conducting our business with integrity, respect, and accountability. We uphold the highest ethical standards and comply with all applicable laws and regulations in the countries where we operate. We recognize our responsibility to protect and promote human rights and dignity in our operations and supply chain.

We have a zero-tolerance policy for any form of human trafficking, forced labor, or slavery in our business activities and in our supply chain, and we condemn all forms of exploitation of children. We expect our employees, contractors, suppliers, and vendors to share our commitment by upholding our values, and support us in our fight against human trafficking, forced labor, and slavery.

We encourage stakeholders to report any concerns or suspicions of violations of our policy through our Ethics Hotline, law enforcement, or the National Human Trafficking Resource Center (NHTRC) at 888-373-7888.

We are committed to continuous improvement and transparency in our efforts to prevent and combat human trafficking, forced labor, and slavery. We welcome feedback and suggestions from our stakeholders.

Freedom of Association

We respect freedom of association and our employees' legal right to join, or not to join, third-party organizations such as labor unions or other lawful organizations of their own selection, along with the right to bargain or not bargain collectively, in accordance with applicable laws, without fear of reprisal, intimidation or harassment. We are committed to fostering open communication between team members and managers and providing our team members with appropriate access to reporting mechanisms. We also refrain from interfering with trade unions.

Appendix

Author	Summary of Change	Section Title	Revision Publish Date
AS MD Corporate Affairs & Compliance	Updated to be in compliance with new Policy Standards.	All Sections	4/3/20
AS MD AGC Litigation & Regulatory Law	Added Sections	Staying Safe, RIM, Social Media – <i>Conduct that is not Prohibited</i>	4/3/20
AS MD Corporate Affairs & Compliance	Updated content in letter, updated links and tone, no major changes	A Note from Ben, All Sections, Our work environment, Social media, Protecting the environment	9/28/21
Ethics and Compliance Director	Updated links and minor revisions. Updated Employment Policy to match current practice and policies in Our People Policies and Horizon Employee Policies. Added policy on anti-slavery and anti-human trafficking to match current practice. Added policy on Freedom of Association to match current practice.	All Sections Reviewed	12/20/2024
Ethics and Compliance Director	Updated language within Culture and Belonging Section	Culture and Belonging Section	4/18/2025
Ethics and Compliance Director	Reformatted the Code. Added a new letter from CEO. Updated language about safety. Included links to Hawaiian Ka 'Ike Pono. Updated links. Updated Non-punitive reporting post SOC and linked to applicable sections in SMS Manual.	All Sections Reviewed	12/15/2025